II. Remarks

Reconsideration and re-examination of this application in view of the above amendments and the following remarks is herein respectfully requested. Claims 1-17 and 20-26 remain pending.

Claim Rejections - 35 U.S.C. §103(a)

Claims 1-2, and 5-7 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 6,323,598 to Guthrie et al. (Guthrie) in view of U.S. Patent 6,724,156 to Fregoso (Fregoso) and U.S. Patent No. 6,150,771 to Perry (Perry).

Claim 21 was rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 5,105,179 to Smith (Smith) in view of U.S. Patent 6,323,598 to Guthrie et al. (Guthrie) and U.S. Patent No. 6,150,771 to Perry (Perry).

Claim 25 was rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 6,411,046 to Muthu (Muthu) in view of U.S. Patent 6,323, 598 to Guthrie et al. (Guthrie) and U.S. Patent No. 6,150,771 to Perry (Perry).

The examiner relies on the combination of Guthrie and Perry to reject independent claims 1, 21, and 25 of the present application. The MPEP §2143.01 provides:

> The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior

art also suggests the desireability of the combination. *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990).

A clearly stated objective for the converter circuit of Perry is to maximize the consistency of the intensity output (Col. 2, Ln. 35). However, the drive circuit of Guthrie is configured to switch the illumination sources from a parallel to series connection at a defined kickover point to result in an overall voltage-luminance characteristic that has greater variability in luminance across the entire operating range of applied input voltages. (Col. 2, Ln 50). Therefore, combining the voltage conversion circuit of Perry with the parallel element configuration of Guthrie would frustrate the stated purpose of both inventions. Accordingly, the references do not suggest the combination of references provided by the Examiner and the Examiner's rejection under 35 U.S.C. §103(a) is improper.

Further, claims 2-20, 22-24, and 26 depend, directly or indirectly, from claims 1, 21, or 25 and are therefore patentable for at least the reasons given above in support of claims 1, 21, and 25.

Conclusion

In view of the above amendments and remarks, it is respectfully submitted that the present form of the claims are patentably distinguishable over the art of record and that this application is now in condition for allowance. Such action is respectfully requested.

Respectfully submitted by,

Dated: 4/8/05

Robert K. Fergan
Reg. No. 51,674
Attorney for Applicant(s)

BRINKS HOFER GILSON & LIONE
P.O. Box 10395
Chicago, IL 60610
(734) 302-6000